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# Privacy Policy

Last updated: December 2, 2022

Fastweb LLC ("Fastweb", "we", "our") is committed to protecting the privacy of our users. We want you to understand how we protect your personal information when we provide you with your results from customized searches for scholarships, college admissions and jobs. We will tell you what types of personal information that we collect, what may happen to that information, and your rights regarding your personal information.

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# Scope of This Privacy Policy

This privacy policy (“Privacy Policy”) applies to information we collect or use on Fastweb.com, Finaid.org, and mobile apps published by Fastweb.

## Types of Information We Collect

Information We Collect Directly from You:

We collect information from you when you choose to give it to us either on our website or through our mobile app. This includes:

- Registration information, such as your name, date of birth, e-mail address, street address, phone number, gender, citizenship status, ethnicity, military status, educational history, and your username and password;
- Optional categories of information, if you choose to provide them, including career objectives, health information, hobbies, and other personal information, which we use to maximize the

effectiveness of your scholarship college admissions and job searches on our website; and

- Additional optional information for participation in surveys or contests, which is completely voluntary on your part, and you have the choice about whether to disclose the information necessary to use these features.

#### Information Automatically Collected From You When You Use Finaid:

We also gather certain information automatically when you visit our website or use our mobile app. This information is passively collected, and Finaid uses it for internal purposes, including, but not limited to, testing, improving a user's experience and disclosures to advertisers and content partners. Finaid only discloses aggregate passive information to advertisers and content partners, including unique visits to our website and impression data. Passive information alone does not identify you to Finaid by name.

This information may include, without limitation, the following:

- internet protocol (IP) address;
- browser type and configuration;

- your activity on Finaid, including where you go on our website or mobile app, how you interact with any specific part of our website or mobile app and how long you stay on any specific part of our website or mobile app.

## **Collection of Information from Children**

Finaid is not intended for, nor do we knowingly collect information from, children under the age of 16.

Finaid may collect information from children who are 16 if they are looking for information on scholarships or jobs.

## **How We Use Information**

We use the information we collect to provide our services, respond to you, for marketing purposes, improve our site, and foster a positive user experience.

By registering with Finaid, by managing your profile, or by opting in when presented with choices, you have consented for us to use your information in the following ways:

**To provide you with our services**, which includes:

- creating a Finaid account for you;
- helping you to search for scholarships, colleges and jobs;
- enabling you to apply for scholarships and jobs; and
- assisting you with contacting us and for us to responding to you

**For marketing**, which includes:

- providing personalized, targeted, or location-based content, services, and advertising from third parties on both our website and on other websites with which we have a business relationship;
- informing you of other products or services available from Finaid or our business partners;
- sending you e-mails regarding updates to our website, free informational newsletters, and notices relating to topics that may

be of special interest to you, including financial aid, admissions

tips, job opportunities, and job advice; and

- conducting surveys, promotions and contests, and to publish the results thereof

**To improve our services**, which includes:

- conducting analytics and generating internal reports about the use of our site;
- tracking which scholarships and jobs you search for, view, and apply to;
- preventing and investigating malicious or fraudulent activity; and
- enhancing your overall experience at our website

## **Automatic Decision Making**

Information you supply will be used to help determine which scholarships you may be eligible for and narrow the total number of scholarships in our database to those relevant to you.

# **How We Share Information**

From time to time, Finaid may decide to use third parties to perform specific services, such as sending newsletters to Finaid users. If Finaid engages a service provider, then some personal information may be shared with the service provider, but only to the extent and purpose necessary for the service provider to provide services on Finaid's behalf.

Finaid uses third-party service providers for the following types of tasks:

- sales and marketing assistance;
- analytics;
- data visualization;
- customer service;
- development and improvement of products and services; and
- system monitoring

## **Sale of Information**



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Finaid will not knowingly sell, share, rent or otherwise transfer your information other than in accordance with the terms set forth in this Privacy Policy.

Finaid is able to offer its free services, in part, based on the willingness of our users to be contacted by colleges or our marketing partners. By agreeing, you acknowledge and agree that the information you supply may be sold to colleges and leading companies. In return, you'll receive free information on college financing and admissions, offers and promotions designed for students, job opportunities, and more.

If you give your permission to allow third parties to contact you, personal information about you, such as your name, gender, age, zip code, citizenship, educational history, and other information collected during your visit to Finaid's website, may be shared with colleges, universities, potential employers, recruiters/headhunters, data aggregators, marketers, and other organizations. You may opt out of the sale of your data when you are first prompted, or by sending a request to [support@finaid.org](mailto:support@finaid.org).

Our use of tracking technologies may be considered a “sale” under California law. You can opt-out of being tracked by these third parties by clicking “Do Not Sell My Personal Information” link at the bottom of our website and selecting your preferences, or by broadcasting the global privacy control signal. Read more about our use of tracking technologies in the Cookies and Online Advertising Section below.

#### Categories of Personal Information Sold in the Last 12 Months:

- Internet or other electronic network activity (e.g., “cookies” or other tracking tags)
- Identifiers (e.g., name, mailing address, email address, phone number)

#### Categories of Third Parties To Whom Information was Sold in the Last 12 Months:

- Advertising networks
- Merchant partners

#### **Information Shared with Business Partners**

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Regardless of your decision regarding the sharing of your personal information, Finaid may share broad aggregate demographic data and related usage information with Finaid's business partners. When your personal information has been aggregated, it can no longer be attributed to a specific individual, meaning it is data that does not contain individual-level information that can be tied back to a specific individual.

## **Information Shared Per Legal Requirement**

While Finaid strives to protect its users' personal information, Finaid discloses personal information to third parties if legally required to do so, if a governmental entity requests Finaid to do so, or if Finaid believes in good faith that such action is necessary to: (a) conform to legal requirements or comply with legal processes; (b) protect the rights or property of Finaid or affiliated companies; (c) prevent a crime or protect national security; or (d) protect the personal safety of users or the public.

# **Cookies and Online Advertising**

analyze trends, administer the website, track user movements around the website, gather demographic information about Finaid's userbase, and choose which ads to display to users.

Finaid uses both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies through your web browser's settings.

We use the following specific types of cookies:

- **Security:** we use these cookies to secure your account
- **Preference:** we use these cookies to store your preferences like language choice and display of scholarship and job search results
- **Analytics:** we use these cookies to track traffic patterns so we can identify popular content and potential problems
- **Features:** we use these cookies to track which scholarships that you search for, view, and apply to so we can show you more scholarships like those. We also use these cookies to split some users into test groups to test new features

- **Advertising:** we use these cookies to collect information about you in order to show you advertising on Finaid and other third-party websites

Finaid also allows other companies to display advertisements to you while you are using our website. When this happens, these companies can view, edit or set their own cookies, just as if you had requested a web page from their site. The cookies placed by these third parties could remain on your computer after you have left our site for up to 20 years unless you choose to delete them.

**Pixels:** Finaid uses pixels, including for example, to count users who have visited specific pages of our website and to allow Finaid to place a cookie on a user's computer. Finaid uses data collected from pixels to compile aggregate statistics about usage of our website.

**Advertising Opt-Out:** Finaid users can opt out of being contacted by our advertising partners. If you would prefer to not receive personalized ads based on your browser or device usage, you may generally express your opt-out preference to no longer receive tailored advertisements. Please note that you will continue to see advertisements, but they will no longer be tailored to your interests.

To opt out of interest-based advertising by participating companies in the following consumer choice mechanisms, please visit:

- **Digital Advertising Alliance (DAA)**'s self-regulatory opt-out page (<https://optout.aboutads.info>) and mobile application-based "AppChoices" download page (<https://youradchoices.com/appchoices>)
- **Network Advertising Initiative (NAI)**'s self-regulatory opt-out page (<https://optout.networkadvertising.org>).

To set an opt-out preference for a mobile device identifier (such as Apple's IDFA or Android's GAID), visit the device manufacturer's current choice instructions page, or read more about sending signals to limit ad tracking for your operating system here: <https://www.networkadvertising.org/mobile-choices>.

Please note that these settings must be changed on each device (including each web browser on each device) for which you wish to opt out, and if you clear your cookies or if you use a different browser or device, you will need to renew your opt-out preferences.

# Social Media Widgets

Our site includes social media features, such as the AddToAny button and the Facebook Comments plugin. Your interactions with these features are governed by the privacy policy of the company providing the specific feature.

## Your Privacy Rights

**Right to Know:** you have the right to know whether Finaid has collected personal information from you. You may submit up to two access requests within a 12-month period directing Finaid to disclose any of the following to you:

- the categories or specific pieces of personal information that Finaid has collected from you;
- the categories of sources from which Finaid has collected your information;
- the reasons why Finaid collects or sells personal information; and
- the categories of third parties with which Finaid shares personal information.

**Right to Delete:** you have the right to request that Finaid delete any of your personal information that Finaid has collected from you with certain exceptions. Finaid may refuse your deletion request if permitted by law. If we deny your deletion request, we will tell you why the request was denied. Additionally, if Finaid can verify your request and determine that no exception to deletion applies, we will direct any of our service providers that have received your personal data to delete your personal information from their records as well.

**Right to Correct:** You have the right to request amendments to your personal data if it's inaccurate or outdated in any way.

**Right to Opt Out of Sharing of Your Data:** you have the right to opt out of Finaid's sharing of your personal information to third parties.

**Right to Opt Out of Sale of Your Data:** you have the right to opt out of Finaid's sale, as defined by the California Consumer Privacy Act, of your personal information to third parties for marketing or advertising purposes.

**Right to Non-Discrimination:** Finaid will not discriminate against you for exercising your privacy rights.



authorized agent may submit a request to access or delete your personal information or opt out of Finaid's sale of your personal information by contacting us at [support@finaid.org](mailto:support@finaid.org). Finaid will verify your request using information associated with your account.

**How You Can Access, Update, or Delete Information:** you can access or update your personal information at any time by logging into the Finaid website and selecting "My Profile." You may delete your account by selecting "Deactivate My Account" on the "Account Settings" page. Users who are experiencing problems with accessing, updating or deleting their information should contact us at [support@finaid.org](mailto:support@finaid.org), and we will try to resolve your problems and respond within a reasonable time.

## Security

The security of your personal information is important to us. Finaid has security measures in place to help protect against the loss, misuse or unauthorized alteration of the information under our control. You are the only user authorized to update your profile, unless you give your

password information to another party. Ultimately, you are responsible for keeping your username and password secret.

Finaid helps protect personal information by using both online and offline security methods, including firewalls, passwords, restricted electronic access to your personal information, and restricted physical access to where your personal information is stored. Our staff members are trained to comply with our security procedures, and our security procedures are regularly reviewed and revised, if necessary, by the Privacy Office at Finaid.

## **Data Retention**

Finaid maintains all personal information for five years from last login and deletes all information after that period.

## **Acceptance of Terms/Changes to Privacy Policy**

Your use of this website or our mobile app indicates your acceptance of the terms of this Privacy Policy.

information practices. If we make material changes, we will notify you by email (sent to the email address specified in your account) where required, or by means of a notice on this website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

## Dispute Resolution

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

## Contact Information

If, at any time, you have questions or concerns regarding this Privacy Policy, or if you are seeking to exercise any of your privacy rights, please contact us online at [support@finaid.org](mailto:support@finaid.org) or offline at:

Fastweb, LLC

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## Quick Links

Your Guide for College Financial Aid

Student Loans